



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

December 9, 2014

David Meyers, Forest Supervisor
Shasta-Trinity National Forest
3644 Avtech Parkway
Redding, CA 96002

Subject: Draft Environmental Impact Statement for the Green-Horse Habitat Restoration and Maintenance Project, Shasta County, California. (CEQ# 20140318)

Dear Mr. Meyers:

The U.S. Environmental Protection Agency has reviewed the Green-Horse Habitat Restoration and Maintenance Project Draft Environmental Impact Statement (Shasta County, California). Our review is provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act which directs EPA to review and comment in writing on the environmental impacts of major federal agency actions.

The proposed project would manage vegetation treatments on approximately 41,836 acres of Shasta Lake Ranger District, Shasta-Trinity National Forest. The project also requires forest plan amendment to decrease the amount of downed materials such as dead trees and shrubs. We understand that the preferred Alternative 2 also calls for approximately 4.61 miles of dozer fire line to facilitate firefighting activities (such as prescribed fire management) and that no commercial timber harvest will take place as a result of this project.

Based on our review of the project's preferred Alternative 2, we have rated the project as Lack of Objections (LO) (see enclosed "Summary of Rating Definitions"). EPA supports the Forest Service decision to modify treatments and prescription elements to avoid impacts to species of concern and their habitat. Further, EPA supports the use of best management practices and monitoring as described in the DEIS, including the wet weather operations standards to protect roads and maintain water quality.

We commend the Forest Service for including impacts from Climate Change on the project area. We encourage the Forest Service to include in the FEIS strategies to mitigate Climate Change during restoration efforts, such as diversifying replanted areas with seeds from different range elevations to maximize the success of replanting. This commitment would consequently allow for species propensity to shift as suitable microclimates shift geographic locations due to climate change.

EPA appreciates the opportunity to review this DEIS. When the FEIS is released, please send one hard copy and one CD to the address above (mail code: ENF-4-2) at the same time the document is formally filed electronically. If you have any questions, please contact me at (415) 972-3521, or have your staff

contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3852 or Munson.James@epa.gov.

Sincerely,

Cornell Dunning

Fdc

Kathleen Martyn Goforth, Manager
Environmental Review Section

Enclosure:

Summary of the EPA Rating System

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

“LO” (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

“EC” (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

“EO” (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

“EU” (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

Category “1” (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category “2” (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category “3” (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.